

REMARKS

Applicant has carefully reviewed the Examiner's May 7, 2003 Official Action and respectfully requests reconsideration based on the above amendments and the following comments.

Claims 1-10 have been canceled in favor of new claims 11-19 which remain in the application for consideration.

In response to the Examiner's objection to claim 3, Applicant has canceled the claim in favor of new claim 13 which was rewritten to further limit the structure of the claimed apparatus. Applicant respectfully submits that this objection has now been overcome.

The Examiner has further rejected claims 1-3 and 6-10 under 35 U.S.C. 102(b) as being anticipated by Goodridge '179, Meloche '694 or Rounds (H1654), claims 4-5 under 35 U.S.C. 103(a) as being unpatentable over Goodridge in view of Turner '447 and claims 4-5 under 35 U.S.C. 103(a) as being unpatentable over Meloche in view of Turner. Applicant respectfully traverses all of these rejections especially as applied to new claims 11-19.

The claimed invention is directed to the combination of a trim cover assembly and a thermal die having a protection element (2) which is both elastic and has a heat insulating property adapted to absorb the impact of the pressure of the die on the trim cover assembly and decrease the heat imparted by the die against the surface of the trim cover assembly.

Applicant respectfully submits that none of the cited prior art either alone or in combination teaches the features of the invention as now set out in new claims 11-19.

Goodridge is directed to compressing a fiber-reinforced resin material (23) into a sine-wave configuration. Applicant respectfully submits that Goodridge does not teach a protection means having an elastic and heat insulation property which reduces the impact and the heat affection from die means on a trim cover assembly. Clearly, the compliant forming surface (90) of Goodridge is not equivalent to the protection means claimed, as surface (90) is described only as a "pressure intensifier that allows a fairly uniform pressure to be placed on the composite workpiece 283 during forming" (see column 7, lines 15-18 of Goodridge). There is nothing whatever in Goodridge that suggests or teaches that surface (90) has both the elastic and heating insulating properties of the protection means claimed.

Applicant submits that Meloche is also not relevant to the claimed invention. Meloche is directed to an iron die to which a refractory heat insulating material (B) is engaged wherein the heat insulating material (B) is coated with a lampblack (C). It is clear that this material is also not equivalent to the claimed protection means as the refractory material is not described to have, nor could it have, an elastic property as claimed by Applicant.

Rounds is also submitted to have no relevancy to the claimed invention. Clearly, the liner film (19) of Rounds is provided only to protect the mould and allow more formulation latitude in the encapsulating resin since release of the resin from metal surfaces is avoided (see Col. 2, lines 22-24 of Rounds). Accordingly, there is nothing whatever in Rounds teaching a protection means having an elastic and heat insulating property as claimed.

Turner is directed to a method of making moulding articles from a fibrous slurry, the articles being used for packing or cushion materials. There is no teaching whatever of using the Turner fibrous slurry material as protection means with the thermal pressure die of the claimed invention.

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Applicant submits that the invention is new and unobvious and not disclosed by the cited art. Accordingly, Applicant respectfully solicits the Examiner's early review and issuance of this application.

Respectfully submitted,

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